



Tetra Tech EM Inc.

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December 31, 1998

Mr. Ken Herstowski
Work Assignment Manager
U.S. Environmental Protection Agency Region 7
726 Minnesota Avenue
Kansas City, Kansas 66101

**Subject: Final Background Information Document
T H Agriculture & Nutrition Company, Inc. (THAN)
Kansas City, Wyandotte County, Kansas
Contract No. 68-W4-0004, Work Assignment No. R07040**

Dear Mr. Herstowski:

Tetra Tech EM Inc. (Tetra Tech) is submitting four copies of the revised background information document for the THAN facility in Kansas City, Kansas. The document is based on a partially completed draft Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) report prepared by Science Applications International Corporation (SAIC), dated July 27, 1995. Under technical directive No. 46, the U.S. Environmental Protection Agency (EPA) directed Tetra Tech to prepare a background information document (BID) for the THAN facility. The BID was to be based on the draft report and file information from EPA and the Kansas Department of Health and Environment (KDHE). This directive was completed, and the report was submitted on May 5, 1998. On December 11, 1998, KDHE submitted 27 comments on the Tetra Tech BID. Tetra Tech has addressed the KDHE comments and is resubmitting the BID. Comments pertaining to the former Daitom facility, located at 5150 Speaker Road, were not incorporated into the revised document.

The draft RFA report submitted by SAIC tentatively identified five solid waste management units (SWMU) and six areas of concern (AOC) associated with the THAN facility. Most SWMUs and AOCs were associated with the former Daitom facility. Only one SWMU is associated with the THAN facility. Tetra Tech did not include the other SWMUs and AOCs in the attached BID for the following reasons:

1. The Daitom facility was a separate corporate entity from the THAN facility, with a separate mailing address. However, THAN owned 50 percent of the Daitom corporate stock.
2. The Daitom facility ceased operation in February 1983, about 9 months before THAN submitted a part A permit application for the inactive overflow pond on its property.
3. During its period of operation, the Daitom facility discharged process wastewater (which THAN claimed to be nonhazardous) to an aeration lagoon on adjacent property owned by Harcross Chemicals, Inc. Daitom reportedly never discharged directly to the overflow pond owned by THAN.



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4. The Daitom plant never sought or operated under RCRA interim status. According to THAN, the Daitom facility never operated as a RCRA treatment, storage, or disposal facility, never stored hazardous waste on the property in excess of the amounts or time periods allowed for small quantity generators, and never produced hazardous materials as waste during its operation.

Tetra Tech revised the BID to clarify operations as they pertained to the THAN facility only. As such, Tetra Tech added subsections to better describe the facility's regulatory and ownership history and revised the facility layout and current property ownership figure. The revised report does not incorporate information KDHE requested regarding operations at the Daitom facility.

If you have any questions or comments on this submittal, please call me at (913) 495-3907.

Sincerely,



Bryce L. Tobyne

BLT/bem

Enclosure

cc: Aaron Zimmerman, U.S. EPA-RPO (letter only)
Kathy Homer, Tetra Tech (letter only)
Pat Reed, Tetra Tech